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NORTHBAY HEALTHCARE GROUP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DESMOND BRAY, on behalf of himself
and all other similarly situated
individuals,

Plaintiff,

vs.

NORTHBAY HEALTHCARE GROUP;
and DOES 1 through 50, inclusive,

Defendant(s).

Case No. 2:21-cv-00598-MCE-KJN

JOINT STATUS REPORT

Date of Filing: March 31, 2021
Trial date: None set

Pursuant to this Court's September 30, 2021 Minute Order [ECF Dkt No. 9], Plaintiff Desmond Bray ("Plaintiff") and Defendant Northbay Healthcare Group ("Defendant") (collectively, the "Parties"), by and through their undersigned counsel of record hereby submit the following Joint Status Report:

I. CASE STATUS

In July 2021, the Parties advised the Court that they would be participating in mediation in December 2021. On December 14, 2021, the Parties attended a global mediation of three different actions – *Staci Feathers, et al. v. NorthBay Healthcare Corp., et al.* (Case No. FCS051101 pending in Solano County Superior Court), *Joan Santiago v. NorthBay Healthcare Group* (Case No. 2:20-cv-01385-MCE-AC) pending before this Court), and the instant action.

The Parties did not come to an agreement on the day of the mediation. However, the Parties reached an agreement in principle to resolve all three actions on December 21, 2021. The Parties are currently working to memorialize the terms of the settlement agreement via a Memorandum of Understanding, after which a long-form settlement agreement will be prepared.

II. FUTURE DATES

Given the complexity of globally resolving these three actions, the Parties believe they will need at least 60 to 90 days to formalize the terms of the settlement agreement. As such, the Parties propose providing the Court with a further joint status report in ninety (90) days to apprise the Court of the status of the settlement agreement, as well as the expected timeline to file a motion for preliminary approval of settlement

1 Dated: January 13, 2022

MORGAN, LEWIS & BOCKIUS LLP

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3 By: /s/ Anahi Cruz

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7 Dated: January 13, 2022

THIERMAN BUCK LLP

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9 By: /s/ Joshua D. Buck (authorized on 1/12/22)

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